JUN 10 1991

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. William Vandersall
Environmental Services Manager
Schlegel Corporation
3200 Main Street
Keokuk, Iowa 52632

Re: Schlegel Corporation Keokuk, Iowa 52632 EPA ID No. IAD005136023

> United Technologies Corporation Keokuk, Iowa 52632 EPA ID No. IAD006537237

Dear Mr. Vandersall:

On the basis of information currently available, the United States Environmental Protection Agency (EPA) has concluded that there is or has been a release of hazardous waste or hazardous constituents into the environment from the facility located at 3200 Main Street, Keokuk, Iowa (Facility). EPA has further concluded that corrective action and other response measures are necessary to protect human health and/or the environment at this Facility.

The Facility has operated in a manner that renders it subject to Section 3005(e) of the Solid Waste Disposal Act, as amended, by the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6925(e). Section 3008 of RCRA, 42 U.S.C. § 6925(h), authorizes EPA to issue an order requiring corrective action and other response measures it deems necessary to protect human health and the environment whenever it determines, on the basis of any information, that there has been a release of hazardous waste into the environment from a facility authorized to operate under Section 3005(e) of RCRA.

			CONCURRENCES	
CNSL	ÍÒWA	IOWA	RCRA ON	
Walther	Tran	Callier	Sanderson	
DATE DEW 5-21-91	Kran 2/30/9	1 TP tor JVC	2 Add	
EPA Form 1325-) (12-70)	7/1	5-31-91	W III V	



- 2 -EPA Region VII's general practice is to attempt to negotiate a final administrative order on consent prior to issuing an initial unilateral administrative order. Enclosed is a draft of an initial unilateral administrative order which EPA currently anticipates issuing if an agreement is not reached on an administrative order on consent. A copy of the initial unilateral administrative order is also being sent to United Technologies Corporation. EPA will refrain from issuing a unilateral order from the date of this letter until July 15, 1991, as long as Schlegel Corporation agrees to enter into such negotiations and continues to negotiate in good faith. If Schlegel Corporation wishes to enter into such negotiations, you or your attorney should so advise me, in writing, within seven (7) days of receipt of this letter. address is Office of Regional Counsel, EPA Region VII, 726 Minnesota Avenue, Kansas City, Kansas 66101. If EPA has not received an affirmative response within that time period, we will assume Schlegel Corporation does not desire to participate in such negotiations. I can be reached by telephone at (913) 551-7735, if you have any questions or wish to schedule a time to begin negotiations. I look forward to hearing from you. Sincerely, Douglas C. Walther Assistant Regional Counsel Enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII 726 MINNESOTA AVENUE KANSAS CITY, KANSAS 66101

JUN 10 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William Vandersall Environmental Services Manager Schlegel Corporation 3200 Main Street Keokuk, Iowa 52632

Re: Schlegel Corporation Keokuk, Iowa 52632 EPA ID No. IAD005136023

> United Technologies Corporation Keokuk, Iowa 52632 EPA ID No. IAD006537237

Dear Mr. Vandersall:

On the basis of information currently available, the United States Environmental Protection Agency (EPA) has concluded that there is or has been a release of hazardous waste or hazardous constituents into the environment from the facility located at 3200 Main Street, Keokuk, Iowa (Facility). EPA has further concluded that corrective action and other response measures are necessary to protect human health and/or the environment at this Facility.

The Facility has operated in a manner that renders it subject to Section 3005(e) of the Solid Waste Disposal Act, as amended, by the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6925(e). Section 3008 of RCRA, 42 U.S.C. § 6925(h), authorizes EPA to issue an order requiring corrective action and other response measures it deems necessary to protect human health and the environment whenever it determines, on the basis of any information, that there has been a release of hazardous waste into the environment from a facility authorized to operate under Section 3005(e) of RCRA.



EPA Region VII's general practice is to attempt to negotiate a final administrative order on consent prior to issuing an initial unilateral administrative order. Enclosed is a draft of an initial unilateral administrative order which EPA currently anticipates issuing if an agreement is not reached on an administrative order on consent. A copy of the initial unilateral administrative order is also being sent to United Technologies Corporation. EPA will refrain from issuing a unilateral order from the date of this letter until July 15, 1991, as long as Schlegel Corporation agrees to enter into such negotiations and continues to negotiate in good faith.

If Schlegel Corporation wishes to enter into such negotiations, you or your attorney should so advise me, in writing, within seven (7) days of receipt of this letter. My address is Office of Regional Counsel, EPA Region VII, 726 Minnesota Avenue, Kansas City, Kansas 66101. If EPA has not received an affirmative response within that time period, we will assume Schlegel Corporation does not desire to participate in such negotiations.

I can be reached by telephone at (913) 551-7735, if you have any questions or wish to schedule a time to begin negotiations. I look forward to hearing from you.

Sincerely,

Douglas C. Walther

Assistant Regional Counsel

Enclosure